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Attorneys for WAYMO LLC

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

WAYMO LLC,

Plaintiff,

vs.

UBER TECHNOLOGIES, INC.;
OTTOMOTTO LLC; OTTO TRUCKING
LLC,

Defendants.

CASE NO. 3:17-cv-00939-WHA

**PLAINTIFF WAYMO LLC'S MOTION
FOR PROTECTIVE ORDER OVER
CERTAIN EXHIBITS TO THE STROZ
DUE DILIGENCE REPORT**

**[REDACTED VERSION – FILED
PUBLICLY]**

1 TO DEFENDANTS UBER TECHNOLOGIES, INC., OTTOMOTTO LLC, AND OTTO
2 TRUCKING LLC, AND THEIR COUNSEL OF RECORD:

3 PLEASE TAKE NOTICE that as soon as the matter may be heard, in the courtroom of the
4 Honorable William Alsup at the United States District Court for the Northern District of
5 California, 450 Golden Gate Ave., San Francisco, California, Plaintiff Waymo LLC (“Waymo”)
6 shall and hereby does move the Court for a Protective Order designating certain exhibits to the
7 Stroz Due Diligence Report as CONFIDENTIAL or HIGHLY CONFIDENTIAL –
8 ATTORNEYS’ EYES ONLY under the existing Protective Order in this case.

9 Waymo’s motion is based on this notice of motion and supporting memorandum of points
10 and authorities, the supporting declaration of Patrick Schmidt and accompanying exhibits, reply
11 briefing in further support of this motion and supporting declarations and accompanying exhibits,
12 as well as other written or oral argument that Waymo may present to the Court.

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14 DATED: September 19, 2017

QUINN EMANUEL URQUHART & SULLIVAN,
LLP

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16 By /s/Charles K. Verhoeven

Charles K. Verhoeven
Attorneys for WAYMO LLC